

LAW OFFICES OF
STEFAN COLEMAN, LLC

March 28, 2017

SUBMITTED VIA ECF

Magistrate Judge Steven I. Locke
 United States District Court
 Eastern District of New York
 100 Federal Plaza
 Central Islip, New York 11722

Re: Avi Cohen v. Slomin's, Inc., No. 2:15-cv-03413-AMD-SIL

Dear Judge Locke:

The office of the undersigned represents Plaintiff Avi Cohen, individually and on behalf of all others similarly situated, in the above-referenced matter. We write to respectfully request a continuance of certain pending dates and deadlines in this matter. Since the entry of the Court's operative scheduling order, the Parties have proceeded with written discovery and have begun the process of scheduling depositions. As they prepared to move forward with depositions, however, the possibility of potential resolution along the lines previously discussed by the Parties has been raised and the Parties intend to discuss the same. In the interim, Plaintiff's lead counsel from Edelson PC in Chicago has taken personal leave following the birth of his child and the available dates for depositions - as well as settlement discussions - have been slightly delayed as a result.

All of that said, to provide the Parties sufficient time to make another attempt at potential settlement while also allowing time for any necessary depositions, we respectfully request an approximately forty-five (45) day continuance of the remaining deadlines in this case. Should the Court grant the instant request, the revised schedule of remaining deadlines would be as follows:

EVENT	DEADLINE
<i>Deadline to Complete Depositions</i>	May 15, 2017
<i>Deadline to Disclose Expert Witnesses for Class Certification</i>	May 30, 2017
<i>Deadline to Disclose Rebuttal Experts for Class Certification</i>	July 14, 2017
<i>Deadline to Complete Expert Discovery for Class Certification</i>	August 11, 2017
<i>Deadline to File Motion for Class Certification</i>	September 1, 2017
<i>Deadline to Oppose Class Certification</i>	October 13, 2017

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<i>Deadline to Reply in Support of Class Certification</i>	November 3, 2017
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Consistent with Your Honor's Scheduling Order and Individual Motion Practices, Plaintiff's counsel has conferred with counsel for the Defendant and is authorized to state that it joins in the requested relief.

Should the Court have any questions, I may be contacted at (877) 333-9427. Thank you for your time and attention in this matter.

Very truly yours,

Law Offices of Stefan Coleman, LLC

/s/ Stefan Coleman
Stefan Coleman, Esq.

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